

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MFB FERTILITY INC., a Colorado
Corporation,

Plaintiff,

V.

ACTION CARE MOBILE VETERINARY
CLINIC, LLC, a Maryland limited liability
company,

Defendant.

[illegible]

Case No. 2023-cv-03854
Dist. Judge John J. Tharp Jr.
Mag. Judge Gabriel A. Fuentes

AGREED MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff, MFB Fertility Inc. (“MFB”), and Defendant, Action Care Mobile Veterinary Clinic, LLC (“Action Care”) (together, the “Parties”) respectfully submit this Motion requesting the Court to enter the Agreed Confidentiality Order to be submitted to the Court separately and contemporaneously with this Motion. In support of their Motion, the Parties state:

1. The Parties agree that discovery in this case contemplates the disclosure and exchange of confidential and proprietary information and request that the proposed Agreed Confidentiality Order be entered to govern the disclosure and use of such information during the course of this litigation.
2. In accordance with Judge John J. Tharp Jr.'s case management procedures, MFB will submit one clean copy of the proposed Agreed Confidentiality Order in Word format to the Court's Proposed Order electronic mailbox.
3. The Parties have made no deletions or additions to the Court's Model Confidentiality Order (Form LR26.2), so a redlined copy of the proposed order will not be necessary.

Respectfully submitted,

Dated: November 26, 2025

**MFB FERTILITY INC., A COLORADO
CORPORATION**

By: /s/ Gary I. Blackman

One of Its Attorneys

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Attorney for Defendant

CERTIFICATE OF SERVICE

I, Gary I. Blackman, an attorney, hereby certify that I caused a true and correct copy of the foregoing **Agreed Motion for Entry of Stipulated Protective Order** to be served upon the parties below via email on November 26, 2025.

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/s/ Gary I. Blackman